

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY
STAFFING AND OTHER MATTERS**

DTE 06-31

**THIRD SET OF INFORMATION REQUESTS OF INTERVENOR UNITED STEEL,
PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY, ALLIED
INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION ("USW"),
AFL-CIO¹**

- USW 3-1: Referring to BSG's response to USW 1-4, between December 1, 1999 to date, provide all documents within the possession, custody, or control of BSG or NCSC, relating to or regarding the performance of identified vendors who have been contracted by NCSC and/or BSG to provide services with regard to Meters to Cash and Customer Contact Center functions. This request includes, but is not limited to, any and all customer complaints regarding functions performed by identified vendors, correspondence between BSG or NCSC and vendors regarding or relating to vendor performance, internal and external memoranda, e-mails, and any other documents evaluating the performance of vendors with regard to Meters to Cash and Customer Contact functions.
- USW 3-2: Referring to BSG's response to USW 1-5, identify every BSG or NCSC employee or agent, and/or NiSource officer or agent responsible for December 2001 decision referenced in Mr. Bryant's response "to require additional

¹ In this request, the term "document" or "documents" means the originals and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise), or in lieu thereof, true and exact copies, regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched or graphic matter of any kind, type or nature whatsoever, however produced or reproduced, including but not limited to contracts, proposals, statements and invoices, financial books and records, letters or other correspondence, e-mails, telegrams, telex messages, memoranda and notes of telephone conversations, telephone logs, memoranda and notes of meetings and interviews, inter-office communications, instructions, notes, memoranda, reports, summaries, manuals, magnetic tapes, tabulations, records, work papers, research papers, books, journals, microfiche, microfilm, photographic film, surveys, charts, studies, data sheets, desk calendars and diaries, policies, printed matter, telephone logs, work sheets and working papers and all documentary materials of any nature whatsoever.

The term "identify" means, with respect to a natural person, (1) his or her name; (2) his or her current job title, if still employed by the Company, and whether he or she is employed directly by Bay State Gas or NiSource; (4) his or her current business address and telephone number; and, (5) the name and address of his or her current employer, if not currently employed by the Company.

The term "identify" means, with respect to documents, (1) the author thereof and the person or persons to whom the document(s) was originally directed; (2) the source from whom Complainant obtained such document(s); (3) the date of each such document(s); (4) the current custodian of each such document(s); (5) the location at which each such document(s) is situated; and, (6) the subject matter of each such document(s).

approvals before vacant positions could be filled.” Provide each individual’s job title when the decision was made, his current position, his employer, and whether each employee received his salary from Bay State, NiSource, or another NiSource affiliate in 2001.

- USW 3-3: Referring to BSG’s response to USW 1-6 and USW 1-5, provide all documents relating to or regarding the December 2001 decision referenced in Mr. Bryant’s response “to require additional approvals before vacant positions could be filled.” This request includes, but is not limited to, all documents regarding, relating to, or informing the decision-makers identified in your response to USW 3-2 to response “to require additional approvals before vacant positions could be filled.”
- USW 3-4: Referring to BSG’s response to USW 1-5 and USW 1-7, state the grounds for the December 2001 decision “to require additional approvals before vacant positions could be filled” at BSG.
- USW 3-5: Referring to BSG’s response to USW 1-5 and USW 1-8, provide the date that December 2001 decision resulting in the policy “to require additional approvals before vacant positions could be filled” at BSG, was officially lifted at BSG.
- USW 3-6: Referring to BSG’s response to USW 1-5 and USW 1-9, identify every Bay State Gas and NCSC employee or agent, as well as all NiSource officers or agents, responsible for the decision to lift the December 2001 policy to “to require additional approvals before vacant positions could be filled” at BSG on the date identified in your response to USW 3-5. Provide each individual’s job title at that time, his employer in 2001.
- USW 3-7: Please state whether the December 2001 decision “to require additional approvals before vacant positions could be filled” applied to other NiSource affiliates, or only to BSG. Additionally, state when the policy to “to require additional approvals before vacant positions could be filled” at other NiSource affiliates was officially lifted.
- USW 3-8: Referring to BSG’s response to USW 1-5 and USW 1-10, provide all documents regarding, relating to, or informing the decision to lift the policy initiated in December 2001 “to require additional approvals before vacant positions could be filled” on the date specified in your response to USW 3-5.
- USW 3-9: Referring to BSG’s response to USW 1-11, for January 1, 2003 to date, identify every BSG and NCSC employee or agent, and/or NiSource officer or agent, with whom Mr. Bryant consulted in order to determine when BSG should pursue a consumer rate increase with the Department of Telecommunications and Energy, e.g., DTE -5-27.

- USW 3-10: For each of the individuals identified in BSG's response to USW 1-16, Table USW 1-16(a), provide all documents informing, regarding, or relating to each listed individual's evaluation of whether NCSC should utilize IBM for customer service, billing, sales, and other functions. This includes, but is not limited to, all reports, memoranda, and e-mails regarding the same.
- USW 3-11: To the extent not provided in BSG's response to USW 3-10, provide all documents informing, regarding, or relating to Mr. Bryant's evaluation of whether NCSC should utilize IBM for customer service, billing, sales and other functions prior to June 21, 2005.
- USW 3-12: To the extent not provided in BSG's response to USW 3-10, provide all documents informing, regarding, or relating to Mr. Bryant's analysis of whether NCSC should utilize IBM for customer service, billing, sales and other functions after June 21, 2005.
- USW 3-13: For each of the individuals identified in BSG's response to USW 1-16, Table USW 1-16(b), provide all documents informing, regarding, or relating to each listed individual's determination of whether NCSC should utilize IBM for customer service, billing, sales, and other functions. This includes, but is not limited to, all reports, memoranda, and e-mails regarding the same.
- USW 3-14: For each of the individuals identified in BSG's response to USW 1-17, provide all documents within the possession, custody or control of BSG or NCSC informing, regarding, or relating to each listed individuals evaluation of whether BSG should utilize IBM and its second-tier vendors for customer service, billing, sales, and other customer facing functions under the June 2005 IBM-NCSC Agreement. This includes, but is not limited to, all reports, memoranda, and e-mails regarding the same.
- USW 3-15: From January 1, 2005 to date, provide all non-privileged documents within the possession, custody or control of NiSource, NCSC, and/or BSG consulted in or informing BSG's late fall 2005 proposal to USW to outsource BSG's "customer facing" functions under the June 2005 IBM-NiSource Agreement.
- USW 3-16: Referring to BSG's response to USW 1-19, provide all documents within the control of NiSource, NCSC, and/or BSG relating to or regarding IBM's presentation "of information about its global resource call centers," including, but not limited to, any documentation of IBM's presentation regarding Vertex as an administrator of call centers.
- USW 3-17: Referring to BSG's response to USW 1-19, provide all requests made by BSG, NCSC, and/or any agent of NiSource, NCSC and/or BSG, requesting information

regarding the IBM's and Vertex's performance administering call centers under agreements with other companies.

- USW 3-18: Referring to BSG's response to USW 1-20, provide all documents, including, but not limited to internal memoranda, reports, and analyses, relating to or regarding IBM's performance of information technology services for NCSC and NiSource affiliates under the June 2005 NCSC-IBM Agreement.
- USW 3-19: Referring to BSG's response to USW 1-27, for each of individuals identified in Table USW-1-27, provide all documents received or authored by the same relating to or regarding any inquiries into service quality indicator deficiencies or consumer complaints by state regulatory agencies after July 1, 2005.
- USW 3-20: Referring to BSG's response to USW 1-28, provide all documents received or sent by Mr. Bryant addressing IBM's performance of information technology and payroll functions pursuant to the June 2005 IBM-NiSource Agreement as of July 1, 2005.

Respectfully submitted,

UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY,
ALLIED INDUSTRIAL AND SERVICE
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By its attorneys,

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